

## EXHIBIT 87

1 UNITED STATES DISTRICT COURT  
2 FOR THE NORTHERN DISTRICT OF OHIO  
3 EASTERN DIVISION

4 IN RE: NATIONAL \*  
5 PRESCRIPTION \* MDL No. 2804  
6 OPIATE LITIGATION \* Case No.  
7 \_\_\_\_\_ \* 1:17-MD-2804  
8 THIS DOCUMENT RELATES \* Hon. Dan A.  
9 TO ALL CASES \* Polster

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11 THURSDAY, DECEMBER 13, 2018

12

13 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER

14 CONFIDENTIALITY REVIEW

15 - - -

16 Videotaped deposition of DEANNA STACY AYERS  
17 CHICK, held at the Law Offices of Robbins  
18 Geller Rudman & Dowd, 3424 Peachtree Road, NE,  
19 Suite 1650, Atlanta, Georgia, commencing  
20 at 9:11 a.m., on the above date, before  
21 Lois A. Robinson, Registered Diplomate  
22 Reporter and Certified Realtime Reporter.

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<p style="text-align: right;">Page 38</p> <p>1 called Avapro and Avalide.</p> <p>2 Q Which is --</p> <p>3 A So these are angiotensin inhibitors;</p> <p>4 Avapro and Avalide in particular.</p> <p>5 Q Those were -- so were all the drugs</p> <p>6 cardiovascular-related?</p> <p>7 A Yes. And also -- I beg your</p> <p>8 pardon -- in the metabolism side of the business,</p> <p>9 I had responsibility for Lantus.</p> <p>10 Q What was that?</p> <p>11 A A basal insulin.</p> <p>12 MR. CHALOS:</p> <p>13 These are American problems, Peter.</p> <p>14 Peter's Dutch. We are in America.</p> <p>15 Q Okay. And, then, what else -- what did</p> <p>16 you do after that?</p> <p>17 A So I returned to the market access team</p> <p>18 as vice president of account management.</p> <p>19 Q Was that for the entire portfolio?</p> <p>20 A Yes.</p> <p>21 Q And then what?</p> <p>22 A And then I was recruited to Archimedes.</p> <p>23 And, so, I left Sanofi and joined Archimedes.</p> <p>24 Q Did Sanofi make an opioid product while</p> <p>25 you were with the company?</p>	<p style="text-align: right;">Page 40</p> <p>1 A Well, the product delivery system had</p> <p>2 a -- a measured dosage approach which was in</p> <p>3 place really to allow for a metered dose, to --</p> <p>4 Q Uh-huh.</p> <p>5 A -- not allow, you know, more product to</p> <p>6 be dispensed than intended, to prevent any -- any</p> <p>7 type of -- or at least to deter any type of</p> <p>8 attempted abuse or --</p> <p>9 And the way in which the product was</p> <p>10 distributed, not only through the mechanism but</p> <p>11 also through the -- a gel formulation that was</p> <p>12 administered to the nasal cavity, also inhibited</p> <p>13 absorption and metered that approach.</p> <p>14 Q Do you recall any of the risks</p> <p>15 associated with the Archimedes product?</p> <p>16 MR. DAVISON:</p> <p>17 Objection.</p> <p>18 A Risks to -- with the Archimedes</p> <p>19 product?</p> <p>20 MR. CHALOS:</p> <p>21 Q Yes, ma'am.</p> <p>22 A Certainly, it, as a fentanyl product,</p> <p>23 there were certain risks that would -- would</p> <p>24 travel with the product. So because the product</p> <p>25 could be abused in other forms, Archimedes took</p>
<p style="text-align: right;">Page 39</p> <p>1 A I don't believe so.</p> <p>2 Q Okay. So what did -- when you joined</p> <p>3 Archimedes, you were involved in the market</p> <p>4 access function? Is that right?</p> <p>5 A Yes.</p> <p>6 Q Was that nasal fentanyl, was that their</p> <p>7 sole product at that point?</p> <p>8 A Yes.</p> <p>9 Q That was your first experience with</p> <p>10 opioids?</p> <p>11 A Yes.</p> <p>12 Q Did you receive any training when you</p> <p>13 joined Archimedes specific to opioids?</p> <p>14 A Not specific to opioids. I recall</p> <p>15 being educated around the product itself.</p> <p>16 Q Did you learn about the risks</p> <p>17 associated with fentanyl at that point?</p> <p>18 A So I learned about the risks associated</p> <p>19 with the product in particular that we were</p> <p>20 marketing. Yes.</p> <p>21 Q What were the risks associated with the</p> <p>22 Archimedes product that you recall?</p> <p>23 A So I would have to go back and look at</p> <p>24 the package insert to recall all of the risks.</p> <p>25 Q Okay. Do you recall any of them?</p>	<p style="text-align: right;">Page 41</p> <p>1 special attention to the mechanism by which the</p> <p>2 product was dispensed to -- to deter that kind of</p> <p>3 abuse.</p> <p>4 Q Was there a risk of addiction with that</p> <p>5 product?</p> <p>6 A Yes.</p> <p>7 Q Did you, when you worked for</p> <p>8 Archimedes, discuss the risks of the product with</p> <p>9 the customers that you dealt with?</p> <p>10 MR. DAVISON:</p> <p>11 Objection to form.</p> <p>12 A So I did not personally -- was not</p> <p>13 personally responsible for customers. But in</p> <p>14 engaging with account executives in their</p> <p>15 customer interactions, yes, there were -- the</p> <p>16 risks of the product were discussed, yes.</p> <p>17 MR. CHALOS:</p> <p>18 Q You, in your capacity at Archimedes,</p> <p>19 dealt with -- did you deal with -- directly with</p> <p>20 people from other entities, or were you solely</p> <p>21 focused internally?</p> <p>22 A So I dealt with people in other</p> <p>23 entities.</p> <p>24 Q Okay. And those -- and these other</p> <p>25 entities were third-party payers, such as</p>

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1 insurance companies and people at CMS?  
 2 A Yes.  
 3 Q Right?  
 4 A Yes.  
 5 Q I'm sorry. I cut you off, I feel like.  
 6 A I wanted to mention that while I was  
 7 hired to lead the market access function, in the  
 8 course of my first year of employment there, I  
 9 was also asked to take on the sales  
 10 responsibility as well.  
 11 Q Okay. And to whom did you sell?  
 12 A So the sales representatives based in  
 13 the field sold to medical oncologists, radiation  
 14 oncologists, and -- and those practices, and --  
 15 and hospital systems.  
 16 Q What was your job? Were you the  
 17 manager of the sales representatives?  
 18 A Vice president of sales and market  
 19 access, yes.  
 20 Q Did the sales representatives report  
 21 directly to you?  
 22 A They reported to region managers, who  
 23 reported in to me.  
 24 Q Is there a problem in the United States  
 25 today with opioid abuse?

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1 MR. DAVISON:  
 2 Objection to form.  
 3 A So I'm aware of issues associated with  
 4 opioid abuse in the US through the news.  
 5 MR. CHALOS:  
 6 Q What type of issues are you aware of?  
 7 A I'm aware of addiction issues.  
 8 Q Any others?  
 9 A No.  
 10 [REDACTED]  
 11 [REDACTED]  
 12 [REDACTED]  
 13 [REDACTED]  
 14 [REDACTED]  
 15 [REDACTED]  
 16 [REDACTED]  
 17 [REDACTED]  
 18 [REDACTED]  
 19 [REDACTED]  
 20 MR. CHALOS:  
 21 Q Do you have any --  
 22 Well, let's go back to your education.  
 23 You were -- you received a bachelor of business  
 24 administration from the University of Georgia; is  
 25 that right?

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1 A Yes.  
 2 Q And then you received an MBA from  
 3 Rutgers in Newark, New Jersey? Sorry. In  
 4 Newark, New Jersey?  
 5 A Yes.  
 6 Q Did you -- do you have any education  
 7 specific to any medical field?  
 8 A No.  
 9 Q Did you take any courses regarding  
 10 pharmacology when you were in college or in  
 11 business school?  
 12 A No.  
 13 Q Was there a focus of your MBA?  
 14 A Yes.  
 15 Q What was that?  
 16 A Finance.  
 17 Q Since you finished your formal  
 18 schooling, have you taken any courses related to  
 19 any medical subject?  
 20 A No, outside of professional training  
 21 provided by the companies I was employed by.  
 22 Q And that professional training relates  
 23 to the company's products? Is that right?  
 24 A Yes.  
 25 Q What professional training have you had

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1 related to opioids? We -- we already talked  
 2 about the Archimedes training that you had  
 3 specific to their product. Is that --  
 4 Let me back up.  
 5 What professional training have you had  
 6 related to opioids specifically?  
 7 A Product-specific training provided by  
 8 my employer.  
 9 Q One example of that is the Archimedes  
 10 nasal fentanyl product?  
 11 A Yes.  
 12 Q Did you receive, when you worked at  
 13 Mallinckrodt, any training related to opioids?  
 14 A Yes. Product training specifically.  
 15 Q Okay. On which product?  
 16 A Xartemis XR in particular.  
 17 Q We're gonna talk about that one a lot.  
 18 It's X-A-R-T-E-M-I-S.  
 19 Oh. You already had it.  
 20 XR.  
 21 Any other products, opioid products,  
 22 that you received training in connection with?  
 23 A I did have some training on Exalgo as  
 24 well.  
 25 Q Any others?

<p style="text-align: right;">Page 46</p> <p>1 A Not that I recall.</p> <p>2 Q Since you left Mallinckrodt, have you</p> <p>3 had any professional responsibility for any</p> <p>4 opioids products?</p> <p>5 A No.</p> <p>6 Q So how did you come to leave</p> <p>7 Archimedes?</p> <p>8 A So the company single asset was</p> <p>9 acquired by another company. At that same time,</p> <p>10 I was being recruited by Mallinckrodt. So when</p> <p>11 the company, Archimedes, dissolved its US</p> <p>12 operation, I joined Mallinckrodt.</p> <p>13 Q Where was Archimedes based?</p> <p>14 A Bedminster, New Jersey.</p> <p>15 Q Was it affiliated with an international</p> <p>16 company?</p> <p>17 A Yes.</p> <p>18 Q Where was that?</p> <p>19 A Company was based in Reading, England.</p> <p>20 Q Were you recruited by Mallinckrodt for</p> <p>21 a specific position?</p> <p>22 A I was.</p> <p>23 Q What is that position?</p> <p>24 A I was recruited for the vice president</p> <p>25 of market access and interviewed for that role</p>	<p style="text-align: right;">Page 48</p> <p>1 A That would have been in the summer of</p> <p>2 2013. I joined the company in August of 2013, so</p> <p>3 it would have been sometime in the preceding</p> <p>4 months, June, July, in that time frame.</p> <p>5 Q Did you, during the course of the</p> <p>6 discussion with Mr. Trudeau or at any point</p> <p>7 before you actually began working for</p> <p>8 Mallinckrodt, did you learn that there was</p> <p>9 somebody already in the position of vice</p> <p>10 president of specialty sales?</p> <p>11 A I didn't learn that until I arrived at</p> <p>12 the company.</p> <p>13 Q That was Mr. Wickline?</p> <p>14 A Yes.</p> <p>15 Q Are you in touch with anyone with</p> <p>16 Mallinckrodt -- I mean, other than the lawyers --</p> <p>17 have you been in touch with anyone at</p> <p>18 Mallinckrodt since you left?</p> <p>19 A Since I left the company, I may have</p> <p>20 had conversations. I don't recall specifically.</p> <p>21 Q Do you -- do you keep up with anyone</p> <p>22 that you -- that works for Mallinckrodt?</p> <p>23 A Currently, no.</p> <p>24 Q What conversations do you think you had</p> <p>25 after you left?</p>
<p style="text-align: right;">Page 47</p> <p>1 throughout. When I was interviewed by the CEO,</p> <p>2 he asked me to consider the vice president of</p> <p>3 specialty sales role. And that's the position I</p> <p>4 assumed with Mallinckrodt.</p> <p>5 Q Who was the CEO at that point?</p> <p>6 A Mark Trudeau.</p> <p>7 Q Where did you interview with him?</p> <p>8 A In the company's headquarters in</p> <p>9 Hazelwood, Missouri.</p> <p>10 Q Did you ever learn why they thought you</p> <p>11 were appropriate for specialty sales rather than</p> <p>12 market access?</p> <p>13 A In my discussion -- discussions with</p> <p>14 executives, there was an appreciation for the</p> <p>15 breadth of my experience in both market access</p> <p>16 and in sales. It was at the time a bit unusual</p> <p>17 to have someone who had the depth and breadth of</p> <p>18 market access experience as well as sales</p> <p>19 experience in -- at that level.</p> <p>20 Q Did your job with Mallinckrodt as vice</p> <p>21 president of specialty sales, did that include a</p> <p>22 market access component?</p> <p>23 A It did not.</p> <p>24 Q When did you interview with</p> <p>25 Mr. Trudeau?</p>	<p style="text-align: right;">Page 49</p> <p>1 MR. DAVISON:</p> <p>2 Objection to form.</p> <p>3 A So the division that I was part of was</p> <p>4 dissolved, and, so, I was asked for things like</p> <p>5 recommendations, job leads. So I engaged in some</p> <p>6 of that -- that type of discussion.</p> <p>7 MR. CHALOS:</p> <p>8 Q Did you have any friend- --</p> <p>9 friendship-type relationships with anyone at</p> <p>10 Mallinckrodt?</p> <p>11 MR. DAVISON:</p> <p>12 Objection to form.</p> <p>13 A Yes.</p> <p>14 MR. CHALOS:</p> <p>15 Q And -- and none of them continued after</p> <p>16 you left?</p> <p>17 A They did, though I -- I have not been</p> <p>18 engaged recently with -- with anyone who's</p> <p>19 currently employed by the company.</p> <p>20 Q Do you keep up with anyone who is a</p> <p>21 former Mallinckrodt employee?</p> <p>22 A Yes.</p> <p>23 Q Who -- who do you keep up with?</p> <p>24 A Mark Sabella.</p> <p>25 Q How do you spell that one?</p>